

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMTRUST NORTH AMERICA, INC. and
TECHNOLOGY INSURANCE COMPANY, INC.,

Plaintiffs,

-against-

SAFEBUILT INSURANCE SERVICES, INC. a/k/a
SAFEBUILT WHOLESALE INSURANCE SERVICES,
INC., THE TAFT COMPANIES, LLC, PREFERRED
GLOBAL HOLDINGS, INC., DAVID E. PIKE, DAVID
E. PIKE, INC., PHILIP SALVAGIO, SALMEN
INSURANCE SERVICES, INC. f/k/a SALVAGIO, INC.,
CARL M.SAVOIA, JOHN DOE CORPORATIONS 1-5,
and JOHN DOES 1-5,

Case No. 14-cv-9494

**NOTICE OF 30(b)(6)
DEPOSITION**

Defendants,

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SAFEBUILT INSURANCE SERVICES, INC., THE
TAFT COMPANIES, LLC, PREFERRED GLOBAL
HOLDINGD, INC., DAVID E. PIKE, DAVID E. PIKE,
INC. d/b/a PIKE INSURANCE SERVICES, PHILIP
SALVAGIO, and SALMEN INSURANCE SERVICES,
INC.

Third Party Plaintiffs,

-against-

NETWORK ADJUSTERS, INC., ROBERT SANDERS,
PREFERRED REINSURANCE INTERMEDIARIES,
BUILDERS & TRADESMEN'S INSURANCE
SERVICES, INC., JOHN DOE BROKERAGES 1-5,
JOHN DOE BROKERS 1-5, JOHN DOE
CORPORATIONS 6-15, and JOHN DOES 6-15,

Third-Party Defendants.

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PLEASE TAKE NOTICE, that Plaintiffs, by and through their attorneys, Ohrenstein &
Brown, LLP, will take the deposition of Defendant/Third Party Plaintiff, THE TAFT
COMPANIES, LLC, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, and
upon consent, commencing on October 2, 2015 at 10:00 AM Eastern Standard Time (and, if

necessary continuing on October 5, 2015) at 400 East Pratt Street, 8th Floor, Baltimore, Maryland 21202, or at such other time or place as is agreed upon by counsel for the parties, and continuing thereafter until completed, before a notary public or other officer duly authorized to administer oaths.

Pursuant to Rule 30(b)(6), Defendant/Third Party Plaintiff shall designate one or more persons to testify on its behalf who are most knowledgeable as to the matters listed in Schedule “A.” Defendant/Third Party Plaintiff shall identify its designees for each subject in Schedule “A” no later than five (5) days prior to the deposition.

Plaintiffs reserve the right to record this examination by sound, sound-and-visual, or stenographic means.

Dated: September 18, 2015
Garden City, New York

OHRENSTEIN & BROWN, LLP

/s/ Michael D. Brown

By: _____

Michael D. Brown, Esq.

Matthew Bryant, Esq.

Attorneys for Plaintiffs

AmTrust North America and

Technology Insurance Company, Inc.

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TO:

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*Safebuilt Insurance Services, Inc. a/k/a Safebuilt Wholesale
Insurance Services, Inc., The Taft Companies, LLC,
Preferred Global Holdings, Inc., David E. Pike, David E.
Pike, Inc., Philip Salvagio, Salmen Insurance Services, Inc.
f/k/a Salvagio, Inc., and John Doe Corporations 1-5, and
John Does 1-5*

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*Attorneys for Third-Party Defendants
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Dove Ann Elise Burns, Esq.
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*Attorneys for Third-Party Defendant
Network Adjusters, Inc.*

Defendant The Taft Companies, LLC (“Taft”) shall designate one or more persons to testify on its behalf who are most knowledgeable as to the matters listed in Schedule “A.”

SCHEDULE “A”

1. Taft’s role, if any, in the management of Pacific Re, Inc., Pac Re-5 AT, Preferred Global, PCIC and SIS;
2. Record and book keeping of:
 - a) Taft and its affiliates; and
 - b) the entities identified in “1” above;
3. Taft’s understanding of its role as a captive manager generally and specifically regarding Pacific Re, Inc. and its protected cell Pac Re 5-AT;
4. The regulator’s reporting requirements for the entities Taft manages, or for which it consults – generally, and specifically related to Montana and California Regulations;
5. Taft’s role in creating and understanding of the Participation Agreement for Pac Re 5-AT;
6. Taft’s role in negotiating the Participation Agreement;
7. Taft’s role as captive manager for each of Pacific Re, Inc.’s protected cells;
8. Taft’s compensation as captive manager for Pacific Re, Inc., its protected cells and PCIC;
9. Taft’s understanding of commissions generally and specifically regarding the program by which AmTrust North America, Inc. and Technology Insurance Company, Inc. were reinsured pursuant to the Safebuilt Insurance Services Captive Reinsurance Agreement (“SIS Program”);
10. Taft’s understanding of premiums generally and specifically regarding the SIS Program;
11. Taft’s involvement in the payment of taxes, particularly premium and surplus line taxes generally and specifically regarding the SIS Program;
12. Taft’s involvement in any SIS Program due diligence;
13. Taft’s involvement with any SIS Program actuarial analysis from 2009 through present;
14. Taft’s involvement with PCIC’s actuarial analysis from 2009 through the present;
15. Taft’s management agreements with Pacific Re, Inc., its cells, PCIC and SIS;

16. General Taft financial information, organization and bookkeeping, policies and procedures, including, but not limited to:

- a. Accounting;
- b. Ledgers, books and records [including any relevant software];
- c. Bank accounts and statements[operating and trust(s)];
- d. Accounts receivable;
- e. Accounts payable;
- f. Reporting [both internally and as contractually required];
- g. Compliance;
- h. Internal controls;